

Before the Federal Communications Commission
Washington, D.C. 20554

In the Matter of RM-10869, Restructuring of the Amateur Radio Service

Comments of Clay Redden, KC4YAU, Prattville, Alabama

Members of the Commission:

Thank you for the opportunity to address Ronald D. Lowrance's (K4SX), recommended changes to the Amateur Radio Service, a recommendation that I oppose.

I was licensed as a Technician Class amateur radio operator – commonly referred to as a No-Code Technician – with the call sign of KC4YAU on March 26, 1991. My license was renewed on March 27, 2001. It is set to expire March 27, 2011. I also was issued a Federal Communications Commission Radio Telephone Third Class Operator Permit with Broadcast Endorsement (Number P3-6-52947) on June 21, 1976.

On the issue of Morse code testing:

In October 1998, I filed comments with the Commission in the matter of the 1998 Biennial Regulatory Review – Amendment of Part 97 of the Commission's Amateur Service Rules related to the Element I – Morse code testing requirements.

At that time, I respectfully told the Commission, "I would support a single code speed test of no more than five (5) words per minute for all HF classes of licenses but only on the condition that the commission also include language in any act, resolution or rule change related to code speed that code requirements will automatically end within three (3) months or less of the elimination of Article S25.5 of the international radio regulations."

While that requirement has not been completely eliminated, the World Radiocommunication Conference 2003 (WRC-03) has reduced the requirement to prove the ability to send and receive Morse signals to operate below 30 MHz from a mandate to an option. Since WRC-03, the countries of Belgium, Germany, the Netherlands, Norway, Switzerland and the United Kingdom have moved to drop Morse code requirements. Other countries are expected to do likewise.

The Commission itself has previously stated that Morse code has had a decreasing role in contemporary communications (NPRM 98-143 Para. 19-21).

Mr. Lowrance states that Morse code is a "key component of communication for our community service responsibilities under and within Department of Homeland Security" and would be the "most reliable mode of communication" in an emergency.

I disagree with that completely.

At one point, Morse code was necessary for communication. However, times have changed. It is a well known fact that most of the military forces of the United States and other countries as well as commercial concerns have abandoned Morse code radio transmissions in favor of more technologically advanced forms of communication such as digital and satellite transmission.

How many times in the past 20 years has Morse code been the sole mode of transmission and reception in times of emergency? How many times in the past 20 years have amateurs either used or heard an SOS call? How many amateur radio emergency nets on high frequency (HF) use single sideband voice as the preferred mode of communication in times of emergency?

The Commission should seriously consider those questions in making its determination about the continued use of Element I – Morse code testing.

I respectfully object to Mr. Lowrance's recommendation that a five (5) word per minute Element I – Morse code test be preserved for General Class licensees and a thirteen (13) word per minute Morse code test be instated for Extra Class licensees. However, I am willing to compromise and accept a five (5) word per minute Morse code test for Extra Class licensees.

That having been said, I strongly believe that the Morse code or CW sub-bands of the high frequency (HF) segment of the Amateur Radio Service should be maintained and preserved.

The Commission should consider a requirement that amateur radio operators of all classes at the time of license renewal take and pass updated written tests. This would require licensees to undertake a form of "continuing education" to keep up with changes to Amateur Radio Service rules and electronic theory.

If at all possible, the Commission should find a way to encourage amateur licensees to commit more time to providing public service communication, whether for disaster, severe weather or a charity bike ride, and the Commission should take that into consideration at the time of license renewal.

Thank you for the opportunity to address you on these issues.

Sincerely

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